

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No: 20-CR-10012-IT
)	
PAUL BATEMAN,)	
Defendant.)	

**ASSENTED-TO MOTION FOR EXCLUSION OF TIME
UNDER THE SPEEDY TRIAL ACT**

The United States of America, by and through the undersigned Assistant United States Attorney, respectfully moves this Court to exclude the time period from April 26, 2022 through and including November 13, 2023 from the speedy trial clock, pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(1)(D) for the time frame related to the filing, hearing, and disposition of pretrial motions, and 18 U.S.C. § 3161(h)(7)(A), on the ground that the ends of justice served by excluding this period outweigh the best interests of the public and the Defendant in a speedy trial.

In support of this request, the government states that all time had previously been excluded through April 25, 2022. On April 26, 2022, the defendant filed a Motion to Reconsider the Court's Orders Denying Defendant's Motion to Suppress and Motion to Compel. [D.126]. The government opposed the motion on May 17, 2022, and the Court denied the motion on November 16, 2022. [D.130]. Following the Court's decision, the parties have had ongoing communications related to legal and discovery issues implicated by other cases charged within and outside the district and, on May 4, 2023, counsel for the defendant filed a letter seeking additional discovery. The parties continue to discuss the exchange of discovery, which counsel for the defendant deems necessary to the thorough review and defense of the case.

A status conference was held on May 11, 2023. During this conference, the parties reported on the status of this ongoing exchange of discovery letters and, with the agreement of the parties, the Court scheduled a November 13, 2023 trial date. Both parties agreed to exclude the time from the Speedy Trial Act through that date. The parties jointly agree that the time from November 16, 2022 through the presently scheduled trial date constitutes “the reasonable time necessary for effective preparation, taking into account the exercise of due diligence,” and that the ends of justice served by granting the requested continuance outweigh the best interests of the public and the defendant in a speedy trial pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). Counsel for the defendant assents to this motion, which the government files to memorialize the in-court agreement.

Respectfully submitted,

RACHAEL S. ROLLINS
Acting United States Attorney

By: /s/ Anne Paruti
Anne Paruti
Assistant United States Attorney

Date: May 11, 2022

CERTIFICATE OF SERVICE

I, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Anne Paruti
Assistant United States Attorney

Dated: May 11, 2023